

Schary, Claire

From: Schary, Claire
Sent: Tuesday, April 08, 2014 8:47 AM
To: Bobby Cochran; Carrie Sanneman
Cc: Byrne, Jennifer; Bott, Dustan; Keenan, Dru; Park, Chae; Poulsom, Susan; Psyk, Christine; Rose, Bob; Stewart, William C.
Subject: Forgot to attach Dru Keenan's comments on JRA draft documents
Attachments: Recommendations on WQT_Second Draft_2014 03 04 dmk edits .docx

Dru just noticed I forgot to attach her comments, despite mentioning them in my previous message – my apologies! Here they are. She starts her comments on page 24 and ends on page 24 because she was focusing on the permit section.

-- Claire

Claire Schary

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From: Schary, Claire
Sent: Friday, April 04, 2014 3:40 PM
To: Bobby Cochran; Carrie Sanneman
Cc: Byrne, Jennifer; Bott, Dustan; Keenan, Dru; Park, Chae; Poulsom, Susan; Psyk, Christine; Rose, Bob; Stewart, William C.
Subject: EPA comments on JRA draft documents

Bobby & Carrie,

Attached are three sets of EPA comments on the main document, and then just my comments on the draft statement. (Also, I upgraded to Office 2013 while I was still preparing my comments and they came out looking like two different people – both me – commented. That's because I did some before and then some after the upgrade, and Microsoft automatically changed my user name in the upgrade.)

I gave my team the option of adding their comments to mine, thinking I might consolidate them all into one document, but since I got all of theirs just today, I decided to let you look at them separately (but most used the version with my comments embedded in them). You are getting comments from Dustan, on behalf of him and Chae on the permits and enforcement sections; Dru Keenan, on behalf of her and Susan on just a portion of the permits section; and Bob Rose on parts of everything up through page 100. Bill looked at all of it and Christine looked at small parts of it but both of them didn't have any comments in addition to the ones I provided on the topics they were most interested in. Jennifer Byrne, the region's attorney newly assigned to water quality trading (and many other water-related topics) is extremely busy with other work that has a higher priority and said she hoped to read it later and definitely provide comments on any final version you develop a year from now. Apparently, I'm the only one with the time and attention span to get through the document in its entirety. And even though I read through it twice, I'm not sure I caught everything we should have commented on, but luckily there will be another round after we've tested a few of these recommendations and revised the document again.

I think the bulk of our comments have to do with the permits section, and Dru's suggested restructuring of that section (which made a lot of sense to me) may make some of the other comments moot. If you need our help in figuring out what to do with our comments, we could have a conference call just on that.

Overall, as several people on my team told me, we think it is a much better document than the first version – perhaps because it's honing in some important recommendations we can all agree to as we make our way through some very

complex topics. The trick is to keep in mind that this isn't a step-by-step guide on how to do trading, but one that is making some unique points on designing a trading program that other guidances don't cover. However, it's still easy to get lost in the various sections and detailed discussions of very specific issues. I think some basic diagrams of how trading would be structured with the different levels of documents (state, watershed, permit, permittee, project developer, etc.) and depicting how actual trades flow through the various recommended elements would help. That may be more useful than my initial idea of a topic guide at the bottom of each page. Maybe it's a diagram with a different part highlighted at the beginning of each section... just a thought. It's your document and you know better than I do on how to pull such a complex discussion together into something coherent and useful.

Good luck in making the next round of revisions, and have a good weekend!

Claire Schary

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